



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

JAN - 9 2017

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-101

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION

Mr. Tony Romberg
Owner, Premium Shingle, LLC
P.O. Box 67
Beaver, Washington 98305

Re: Premium Shingle, LLC
Washington Industrial Stormwater General Permit Number WAR302620

Dear Mr. Romberg:

On March 20, 2015, the Washington Department of Ecology (WDOE) issued an Industrial Stormwater General Permit (ISGP) to Premium Shingle, LLC ("Facility"), ISGP Permit Number WAR302620, which will expire on December 31, 2019. On June 6, 2016, the U.S. Environmental Protection Agency (EPA) conducted an inspection of the Facility to determine compliance with the Washington ISGP and Section 402 of the Clean Water Act (CWA). The purpose of this letter is to notify you of violations EPA discovered upon review of administrative files, including the Discharge Monitoring Reports (DMRs) submitted by the facility in response to the inspection conducted by EPA. I would like to express my appreciation for your staff's time and cooperation during the inspection.

ADMINISTRATIVE FILE REVIEW

1. EPA reviewed the Washington Water Quality Permitting and Reporting Information System ("PARIS") DMRs from October 2011 through November 2016 and identified one benchmark exceedance, which occurred during the 3rd Quarter of 2016. The benchmark limit for copper is 14µg/L. The copper level reported for the 3rd Quarter of 2016 was 15.8µg/L.
2. Part S9.A.2 of the ISGP specifies that the DMRs are due by the dates shown in Table 9 below:

Table 9: Reporting Dates and DMR Due Dates

Reporting Period	Months	DMR Due Date
1st	January - March	May 15
2nd	April - June	August 15
3rd	July - September	November 15
4th	October - December	February 15

Upon review of PARIS records from October 2011 through November 2016, EPA discovered that the Facility submitted the 4th Quarter 2015 DMR late. This is a violation of Part S9.A.2 of the ISGP.

3. Part S9.B.1 of the ISGP states, "The Permittee shall submit a complete and accurate Annual Report to the Department of Ecology no later than May 15th of each year using Ecology's Water Quality Permitting Portal – Permit Submittals application, unless a waiver from electronic reporting has been granted according to S9.A.3. Annual Reports are not required if the Permittee didn't have permit coverage during the previous calendar year."

Upon review of PARIS records from October 2011 through November 2016, EPA discovered that the Facility was late in submitting the 2014 Annual Report, due by May 15, 2015, and the 2015 Annual Report, due by May 15, 2016. These are violations of Part S9.A.2 of the ISGP.

JUNE 2016 INSPECTION

1. Part S3.B.4.b.i.5 of the ISGP states, in part, "The SWPPP shall include BMPs to provide SWPPP training for employees who have duties in areas of industrial activities subject to this permit."

Part S3.B.5 of the ISGP states, in part, that the training plan must "include a log of the dates on which specific employees received training."

At the time of the inspection, the inspector asked if the employees were receiving the proper training as required by the permit and outlined in the Stormwater Pollution Prevention Plan. The inspector was told that the training was conducted but not documented. Failure to conduct or document required training is a violation of Parts S3.B.4.b.i.5 and S3.B.5 of the ISGP.

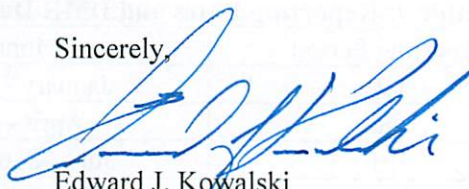
2. Part S7.A.1 of the ISGP states, "The Permittee shall conduct and document visual inspections of the site each month."

At the time of the inspection, the inspector requested to review copies of the monthly visual inspection reports since operations began at that location. The inspector was told that the monthly inspections had not been conducted. According to the Facility's application for coverage under ISGP, the Facility began operations on May 1 2014. From that date to the inspection on June 6, 2016, the Facility failed to conduct monthly visual inspections 19 times. These are violations of Part S7.A.1.

Although our goal is to ensure facilities comply fully with their permits, the ultimate responsibility rests with the permittee. As such, I want to strongly encourage you to continue your efforts to maintain full knowledge of the ISGP requirements, and other appropriate statutes, and to respond appropriately to ensure compliance. Notwithstanding your response to this letter, EPA retains all rights to pursue enforcement actions to address these and any other violations.

I have enclosed a copy of the inspection report (Enclosure). If you have any questions concerning this matter, please call Raymond Andrews of my staff at (206) 553-4252.

Sincerely,



Edward J. Kowalski
Director

Enclosure

cc: Mr. Steve Eberl,
Water Quality Program Manager, Southwest Regional Office
Washington Department of Ecology

Mr. Rich Doenges
Water Quality, Southwest Regional Office
Washington Department of Ecology

Mr. Iloba Odum, Vancouver Field Office
Manager, Vancouver Field Office
Washington Department of Ecology

Enclosure

1. The purpose of this enclosure is to provide a means of communication between the various departments of the organization. It is intended to be used for the exchange of information and the coordination of activities. It is not to be used for the purpose of creating a record of the organization's activities.



United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 <input type="checkbox"/> N <input type="checkbox"/>	W A R 3 0 2 6 2 0	4 8 0 6 0 6	-	R	2
Remarks					
21					
Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BJ	QA	Reserved	
67 <input type="checkbox"/> <input type="checkbox"/> 69	70 <input type="checkbox"/>	71 <input type="checkbox"/>	72 <input type="checkbox"/>	73 <input type="checkbox"/> 74	75 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Premium Shingle, LLC 1421 Russell Road Forks, Washington 98331	Entry Time/Date 06/06/16 9:00 am	Permit Effective Date 01/02/2015
	Exit Time/Date 06/06/16 12:15 pm	Permit Expiration Date 12/31/2019
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Tony Romberg, Owner, 360-640-8181	Other Facility Data (e.g., SIC NAICS, and other descriptive information) SIC: 2421 NAICS: 321113 Latitude: 47.93573 Longitude: -124.40178	
Name, Address of Responsible Official/Title/Phone and Fax Number Tony Romberg, Owner, 360-640-8181 P.O. Box 67 Beaver, Washington 98305	Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes SEV Description

• • • • • • • • • •
 • • • • • • • • • •
 • • • • • • • • • •
 • • • • • • • • • •

See Attached Report

Name(s) and Signature(s) of Inspector(s)

Joseph Roberto

Agency/Office/Phone and Fax Numbers

EPA/OCE/206-553-1669

Date

06/17/16

Signature of Management, QA Reviewer

Agency/Office/Phone and Fax Numbers

EPA/OCE 3-0955

Date

8/4/16

INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A Performance Audit	U IU Inspection with Pretreatment Audit	I Pretreatment Compliance (Oversight)
B Compliance Biomonitoring	X Toxics Inspection	@ Follow-up (enforcement)
C Compliance Evaluation (non-sampling)	Z Sludge - Biosolids	{ Storm Water-Construction-Sampling
D Diagnostic	# Combined Sewer Overflow-Sampling	} Storm Water-Construction-Non-Sampling
F Pretreatment (Follow-up)	\$ Combined Sewer Overflow-Non-Sampling	: Storm Water-Non-Construction-Sampling
G Pretreatment (Audit)	+ Sanitary Sewer Overflow-Sampling	~ Storm Water-Non-Construction-Non-Sampling
I Industrial User (IU) Inspection	& Sanitary Sewer Overflow-Non-Sampling	< Storm Water-MS4-Sampling
J Complaints	\ CAFO-Sampling	- Storm Water-MS4-Non-Sampling
M Multimedia	= CAFO-Non-Sampling	> Storm Water-MS4-Audit
N Spill	2 IU Sampling Inspection	
O Compliance Evaluation (Oversight)	3 IU Non-Sampling Inspection	
P Pretreatment Compliance Inspection	4 IU Toxics Inspection	
R Reconnaissance	5 IU Sampling Inspection with Pretreatment	
S Compliance Sampling	6 IU Non-Sampling Inspection with Pretreatment	
	7 IU Toxics with Pretreatment	

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)	O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
B — EPA (Contractor)	Other Inspectors, State (Specify in Remarks columns)
E — Corps of Engineers	EPA Regional Inspector
J — Joint EPA/State Inspectors—EPA Lead	State Inspector
L — Local Health Department (State)	Joint State/EPA Inspectors—State lead
N — NEIC Inspectors	

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

**NPDES
Inspection Report**

**Premium Shingle, LLC
(NPDES Permit #: WAR302620)**

Forks, Washington

June 6, 2016

Prepared by:

**Joe Roberto
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Multi-media Inspection and RCRA Enforcement Unit**

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List of Acronyms

- | | | |
|---------|---|---|
| • BMP | - | Best Management Practice |
| • COD | - | Chemical Oxygen Demand |
| • DMR | - | Discharge Monitoring Report |
| • DOE | - | Washington Department of Ecology |
| • ISGP | - | Washington Industrial Stormwater General Permit |
| • NOI | - | Notice of Intent |
| • NPDES | - | National Pollutant Discharge Elimination System |
| • SIC | - | Standard Industrial Classification Code |
| • SWPPP | - | Stormwater Pollution Prevention Plan |
| • TSS | - | Total Suspended Solids |

Premium Shingle, LLC NPDES Inspection Report

(This inspection report documents the findings of the inspection conducted at Premium Shingle, LLC on June 6, 2016. This inspection consisted of an **opening conference** to discuss the purpose and expectations of the inspection, a **facility tour** to inspect the stormwater impacted areas of the site, a **records review** to evaluate permit required documentation, and a **closing conference** to discuss the areas of concern identified during the inspection.

Unless otherwise noted, all details in this inspection report were obtained from conversations with Tony Romberg or from observations during the inspection.)

I. Inspection Information

Facility Name	Premium Shingle, LLC (facility)
Inspection Purpose	The primary focus of this inspection was to conduct an industrial stormwater inspection to determine compliance with the ISGP and Section 402 of the Clean Water Act. For this facility, this meant evaluating the management of stormwater at the site.
Arrival and Departure Date and Time	June 6, 2016: 9:00 AM to 12:15 PM
Weather Condition	Clear and Dry
Facility Representatives Present	Tony Romberg
Inspectors Present	Joe Roberto (EPA)
Observed Discharge	I did not see a discharge on the day of the inspection.
Inspection Entry	<ul style="list-style-type: none">• The inspection was unannounced.• I presented my EPA credentials Mr. Romberg.• I explained the purpose of the inspection to Mr. Romberg.• I was not denied access to the facility.• Mr. Romberg accompanied me throughout the inspection.
Annual Revenue	Approximately \$300,000 (Gross)
Inspection Type	Compliance evaluation inspection, without sample collection
Handouts Provided	<ul style="list-style-type: none">• Business Cards• U.S. EPA Small Business Resources Information Sheet

II. Facility Information

A. General Information

Owner and Operator	Premium Shingle, LLC owns and operates the business. The land occupied by the facility is owned by the City of Forks, Washington.
Type of Operation	Cedar shake and shingle manufacturing
SIC Code	2421 (Sawmills and Planing Mills, General) (Obtained from the facility SWPPP)
Physical Address	1421 Russell Road Forks, Washington 98331
Mailing Address	P.O. Box 67 Beaver, Washington 98305
GPS Coordinates	+47.93573°/-124.40178°
Facility Size	1.38 acres (See Attachment A)
Number of Employees	3
Length of Operation	This facility began operating at this location in January 2015.
Number of Outfalls	One outfall was being monitored according to Mr. Romberg.
Date of Last Inspection	An inspection has not been conducted since Premium Shingle, LLC began operating this facility in January 2015.
Prior Enforcement Actions	A formal enforcement action has not been issued to Premium Shingle, LLC.

B. Facility Contacts

Name	Title	Phone Number	Email Address
Tony Romberg	Owner and Operator	(360) 640-8181	premiumshinglellc@hotmail.com

C. Permit Status

At the time of the inspection, this facility was covered by the ISGP. Specifics regarding this permit are as follows:

NPDES Permit Number	WAR302620
Permit Effective Date	March 20, 2015
Permit Expiration Date	December 31, 2019

See the permit coverage letter included as Attachment B of this report for details regarding permit coverage for this facility.

D. Receiving Water

According to information provided in the facility's general permit application (see Attachment A), stormwater discharges from this facility ultimately flow to Mill Creek.

I did not verify the discharge pathway leading from the facility outfall to Mill Creek at the time of the inspection. As a result, the conclusion that the facility's discharges connect to Mill Creek is based solely on the information in the facility's general permit application.

E. Facility Description/Background

This facility is a shake and shingle manufacturing company with the following physical characteristics:

- The facility consists of one building structure that houses the shake and shingle manufacturing processes. See photograph #s 2 to 4 of Attachment D.
- The facility consists of outdoor storage areas used for raw material and equipment storage. See photograph #s 4 to 6 of Attachment D.
- The bulk of the outdoor areas have a gravel surface. See Attachment D.
- Waste generated in the manufacturing process includes sawdust and other residual wood which is collected in a trailer and hauled offsite for final disposal. See photograph #4 of Attachment D.

The manufacturing of shakes and shingles at this facility begins with the delivery of raw materials (precut cedar blocks). These cedar blocks are then processed (split or cut) to form the shakes and shingles. The final steps in the manufacturing process are the bundling and wrapping of the final product in preparation for shipment. See photograph #s 3 and 4 of Attachment D for a view of the raw materials.

Observations during the facility tour portion of the inspection indicate that the topography of the site is such that the bulk of the stormwater generally infiltrates into the ground or flows toward the southwest corner of the property. Stormwater accumulated at the southwest corner of this site is then ultimately routed to Mill Creek. See the "Stormwater Generation, Treatment and Discharge" section of this report for further details on the discharges from this facility.

See also Attachment C for an aerial photograph that identifies the major components of this facility.

III. Permit Applicability and Requirements

Information obtained from the facility SWPPP indicates that the SIC code for the activity conducted at this facility is 2421. According to Condition S1 of the ISGP, facilities that

fall under SIC code 2421 are eligible for permit coverage under the ISGP.

Coverage under the ISGP means that this facility is responsible for complying with ISGP requirements including the following:

- Develop and implement a SWPPP to cover stormwater related activities at the facility as established in Condition S3.A.1 of the ISGP.
- Conduct and document monthly visual facility inspections as established in Condition S7.A.1 of the ISGP.
- Conduct quarterly benchmark monitoring for turbidity, pH, oil sheen, total copper, and total zinc as established in Condition S4 and Table 2 of the ISGP.
- Conduct quarterly benchmark monitoring for COD and TSS as established in Table 3 of the ISGP.
- Prepare and submit DMRs which document the results of quarterly benchmark monitoring as established in Condition S9.A of the ISGP.
- Perform corrective actions to assure that stormwater discharges from the facility are achieving benchmark limitations as established in Condition S8 of the ISGP.
- Prepare and submit an annual report to Ecology that documents the corrective actions conducted during the calendar year as established in Condition S8.B of the ISGP.

These listed permit requirements were the primary focus of the inspection. Where deficiencies were observed, I have documented them in the "Areas of Concern" section of this report.

IV. Inspection Findings

A. Facility Tour

During the facility tour I examined all areas occupied by the facility including the outdoor material storage areas, stormwater outfalls, and the vicinity of the sample collection location.

See Attachment D of this report which is photographic documentation of the facility as seen during the facility tour.

B. Stormwater Generation, Treatment and Discharge

As mentioned earlier in this report, the primary focus of this inspection was to evaluate the management of stormwater at the site. Stormwater generated at this facility is the result of precipitation falling within the footprint of the facility.

Premium Shingle, LLC NPDES Inspection Report

The handling of stormwater from this facility is such that it is not collected, treated, detained or contained in any way. Instead, stormwater is just conveyed and directed away from the facility via the natural contour of the site.

At the time of the inspection, Mr. Romberg indicated that all the stormwater (including roof runoff) at the facility flows toward the southwest corner of the facility where it collects in a low spot on the property before flowing west and discharging into the roadside ditch along Russell Road. Stormwater entering the roadside ditch is then routed to Mill Creek. See photograph #s 7 and 8 of Attachment D for a view of this discharge area.

See also Attachment C for an aerial photograph showing the approximate stormwater flow pathway from the facility.

C. Records Review

As part of the inspection, I requested that the following documents be produced for review:

- **NPDES Permit** – At the time of the inspection, Mr. Romberg produced a copy of the latest version (effective January 2, 2015) of the general permit.
- **Permit Coverage Letter** – Mr. Romberg produced the permit coverage letter, dated March 20, 2015, as requested. See Attachment B.
- **Monthly Visual Inspection Reports** – At the time of the inspection, I asked Mr. Romberg for the monthly inspection reports generated since he began operating at this site. According to Mr. Romberg, these monthly inspections have not been conducted.
- **SWPPP** – At the time of the inspection, I asked Mr. Romberg for a copy of the latest SWPPP for the facility. Mr. Romberg was not able to produce a copy of the SWPPP at the time of the inspection. However, subsequent to the inspection, on June 8, 2016, Kristine Somers (with Clear Water Services) sent me an electronic version of the SWPPP (for Premium Shingle, LLC), dated February 25, 2015.
- **DMRs** – At the time of the inspection, I asked Mr. Romberg for the DMRs generated since Premium Shingle, LLC began operating the facility in January 2015. Mr. Romberg produced DMRs going back as far as March 2015. See Attachment E of this report for monitoring information generated by the facility.
- **Annual Reports** – At the time of the inspection, I requested the annual report for 2015. Mr. Romberg indicated that he has not yet submitted an annual report for this facility. Subsequent to the inspection, on June 13, 2016, Mr. Romberg sent me an electronic copy of the 2015 annual report that he

submitted to DOE.

- **Training Records** – At the time of the inspection, I asked for employee training records. Mr. Romberg indicated that employee training is conducted, however, they are not documented.

Note that the review of the above documents was not a comprehensive review designed to identify all deficiencies. Rather, the review of these documents was more cursory in nature.

Any records deficiencies observed are listed in the “Areas of Concern” section of this report.

D. Facility Stormwater Monitoring

The ISGP requires that stormwater discharges from this facility be monitored quarterly for turbidity, pH, oil sheen, total copper, total zinc, COD, and TSS. This monitoring is conducted of stormwater just prior to exiting the facility near the southwest corner of the site.

As part of the records review, I requested monitoring information for samples collected by the facility. The results of the monitoring conducted for this facility are summarized in the following table.

Quarterly Stormwater Monitoring Results

Date	Turbidity (NTU)	pH (s.u.)	Total Cu (ug/l)	Total Zn (ug/l)	COD (mg/l)	TSS (mg/l)
06/02/15	3.3	7.0	8.7	47.4	20.9	ND
09/03/15	22.8	7.0	7.0	7.5	10.3	11.0
4 th Quarter 2015	Samples Not Collected					
02/15/16	2.8	6.0	2.6	8.5	ND	ND
03/29/16	2.5	6.0	5.2	17.4	45	ND
06/13/16	1.7	6.5	3.4	7.8	30.8	ND
Benchmark Values	25	5.0 to 9.0	14	117	120	100

ND – Not Detected

Review of this monitoring information indicates the following:

- Stormwater monitoring is conducted at one outfall location at this facility.
- Sample results indicate that benchmark values have not been exceeded at this facility.
- Samples were not collected during the 4th quarter of 2015.

See Attachment E of this report for documentation supporting these monitoring results.

V. Areas of Concern

At the time of the inspection I identified several areas of concern. These concerns are identified as follows:

A. Monthly Visual Inspections

Condition S7.A.1 of the ISGP states that "The Permittee shall conduct and document visual inspections of the site each month."

At the time of the inspection, I asked Mr. Romberg for copies of the monthly visual inspection reports since the facility started operating at this facility. Mr. Romberg indicated that these monthly inspections have not been conducted.

The concern is that monthly visual inspections of the facility have not been conducted or documented as required by the ISGP.

Subsequent to the June 6, 2016 inspection, facility representatives initiated a monthly visual inspection program. See Attachment F for a copy of the first visual inspection report prepared for the facility (for June 2016).

B. Employee Training

Condition S3.B.4.b.i.5 of the ISGP states that "The SWPPP shall include BMPs to provide SWPPP training for employees who have duties in the areas of industrial activities subject to this permit." This condition of the permit specifies that the permittee shall train employees annually, at a minimum.

In addition, Part 4.1.10 of the facility SWPPP discusses the employee training requirements. This part of the SWPPP states that "Employees shall be trained upon hire and receive refresher training annually."

At the time of the inspection I asked Mr. Romberg whether employees at the facility received annual training as required in the ISGP. Mr. Romberg indicated that training is conducted, however, it is not documented.

Subsequent to the June 6, 2016 inspection, facility representatives began documenting the employee training conducted. See Attachment G for a copy of training documented so far.

C. 4th Quarter 2015 Benchmark Monitoring

Condition S4 and Table 2 of the ISGP specify benchmark monitoring requirements. These requirements specify that stormwater discharges from the facility be monitored once per quarter for turbidity, pH, oil sheen, total copper and total zinc.

Premium Shingle, LLC NPDES Inspection Report

In addition, Table 3 of the ISGP specifies that, for this facility, benchmark monitoring must also be conducted quarterly for COD and TSS.

At the time of the inspection, I requested the monitoring records for this facility. Mr. Romberg provided laboratory data sheets for all quarterly monitoring conducted since March 2015. The monitoring records indicate that all the monitoring was conducted during all quarters since Premium Shingle, LLC began operating the facility in January 2015, except for the 4th quarter of 2015.

During the inspection, Mr. Romberg explained that that he attempted to conduct the 4th quarter 2015 monitoring, however, the monitoring that actually occurred took place on February 15, 2016 which was conducted too late to be considered a 4th quarter 2015 sample.

The concern is that monitoring was not conducted during the 4th quarter of 2015 as required by the ISGP.

VI. Closing Conference

Prior to concluding the inspection, I held a closing conference with Mr. Romberg on June 6, 2016. The purpose of this closing conference was to discuss the preliminary findings of the inspection. I discussed the areas of concern listed above and then I thanked Mr. Romberg for his time and assistance with the inspection.

Report Completion Date:

August 3, 2016

Lead Inspector Signature:

John A. [Signature]

ATTACHMENT A

Application for Coverage Under the General Permit

Dated: January 8, 2015

Premium Shingle, LLC



Application for Coverage Under the General
Permit to Discharge Stormwater Associated with
Industrial Activity

☒ New Permit Application
☐ Update Permit Information
Permit No. _____

Please print clearly in ink or type and read instructions before filling out this form. All sections are required unless otherwise noted.

DEPARTMENT OF ECOLOGY

I. Permittee Information

(All permit and billing correspondence will be mailed here)

JAN 15 2015

Permittee's Name Tony Romberg		Company Name Premium Shingle, LLC		WATER QUALITY PROGRAM	
Title Owner		Universal Business Identifier (UBI)-Number 602-681-258			
Phone No. 360-640-8181	Fax No.	Street Address or P.O. Box P.O. Box 67			
E-mail premiumshinglellc@hotmail.com		City Beaver	State WA	Zip + 4 98331	

II. Facility Information

Name of Facility Premium Shingle			Date facility began operation or will begin operation May 1, 2014		
Facility Contact Name Tony Romberg			Phone No. 360-640-8181		
Facility Contact Email Address P.O. Box 67			Fax No.		
Facility Street Address (or Location Description) 1421 Russell Road			Record site location at front door or site entrance Latitude 49 ° 56 ' 12.84 " Longitude 124 ° 24 ' 5.16 "		
City Forks	State WA	Zip + 4 98331	County Clallam	Size of Site in Acres 1.38	

A. List your Standard Industrial Classification (SIC) codes below with the primary SIC code in box 1. You must identify all industrial activities performed at your facility. (See Table 1 in the permit for a list of activities.) You must translate the North American Industry Classification System (NAICS) code for your facility into a SIC code online at <http://www.census.gov/epcd/www/naicstab.htm>.

a	2	4	2	1	b				c				d				e				f			
---	---	---	---	---	---	--	--	--	---	--	--	--	---	--	--	--	---	--	--	--	---	--	--	--

B. Type or Nature of Industrial Activities:

Cedar shingle mill.

C. Is this facility a Hazardous Waste Treatment, Storage, and Disposal (TSD) facility regulated under Chapter 173-303 WAC? ☐ Yes ☒ No

D. For Airport Facilities:

Is the facility located at an airport where a single facility, or a combination of facilities, use more than 100,000 gallons of glycol-based deicing chemicals and/or 100 tons or more of urea on an average annual basis? ☐ Yes ☐ No If yes, identify the sampling points that collect runoff from deicing activities:

III. Other Permits/Registration Check all that apply.

<input type="checkbox"/> NPDES Permit (Individual or General Construction Stormwater) Permit No. _____
<input type="checkbox"/> State Waste Discharge Permit (Ground Discharges) Permit No. _____

IV. Site Information

A. Indicate whether your site's stormwater could enter surface waters, directly and/or indirectly:

- ☒ Water will discharge directly or indirectly (through a storm drain system or roadside ditch) into one or more surface waterbodies (wetlands, creeks, lakes, and all other surface waters and water courses).
- ☐ Water will discharge to ground with 100% infiltration, with no potential to reach surface waters under any conditions. (If checked, skip to section V.)

B. Discharge Point(s) Latitude and Longitude*: Provide latitude and longitude expressed in degrees (°), minutes (′), and seconds (″) for each of your facility's discharge point(s). List all discharge points. Use topographic maps and GPS settings that use the 1983 North American Datum (NAD 83). Use an extra sheet of paper if necessary.

For the discharge identifier, provide a unique name, number, or letter to identify the point(s) of discharge. The identifier can be a maximum of four characters long.

If you identify more than one discharge point, mark the discharge point(s) you will sample to comply with the permit sampling requirements by checking the "S/P" (sample point) box.

Discharge identifier. These cannot be symbols. (maximum of four characters, e.g., 001A)				Latitude degrees, minutes, seconds	Longitude degrees, minutes, seconds	S/P	Location description
R	1			47° 56' 12N	124° 24' 6W	<input checked="" type="checkbox"/>	
R	2			47° 56' 11N	124° 24' 6W	<input type="checkbox"/>	
				° ' N	° ' W	<input type="checkbox"/>	
				° ' N	° ' W	<input type="checkbox"/>	
				° ' N	° ' W	<input type="checkbox"/>	

NOTE: You must use the unique identifier for the sampling point on each discharge monitoring report (DMR) form you will submit each quarter. Ecology will provide the DMR form when we issue coverage under the permit.

C. Receiving Water Latitude / Longitude: Provide latitude and longitude expressed in degrees (°), minutes (′), and seconds (″) of your facility's discharge where it enters the receiving water(s). Use topographic maps and GPS settings that use the 1983 North American Datum (NAD 83). List all receiving waters for the site. These receiving waters must be listed in the public notice. Use an extra sheet of paper if necessary.

Receiving Water Body	Latitude degrees, minutes, seconds	Longitude degrees, minutes, seconds
Mill Creek	47° 56' 12N	124° 24' 11W
	° ' N	° ' W
	° ' N	° ' W
	° ' N	° ' W
	° ' N	° ' W

D. Name of Conveyance System: If you discharge to a municipal stormwater system or other stormwater conveyance system (e.g., Kent stormwater drainage system, roadside ditch), identify the system by name or if unnamed, by other identifier (e.g., 145th street ditch)

Russell Road Stormwater Ditch

V. State Environmental Policy Act (SEPA)

Applies only to facilities that began operations after January 1, 2010.

Has a SEPA review been completed?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Exempt
Type of SEPA determination:	<input type="checkbox"/> Determination of Non-Significance (DNS) <input type="checkbox"/> Final Environmental Impact Statement (EIS) <input type="checkbox"/> Mitigated DNS (MDNS)		
Agency issuing DNS, MDNS, Final EIS, or Exemption:	_____		
Date:	_____		

VI. Public Notice

New Facilities beginning operations after January 1, 2010 must publish a public notice at least **once** a week for **two** consecutive weeks with **seven days** in between publications, in a **single** newspaper of general circulation in the county in which the facility is located. Ecology cannot grant permit coverage earlier than the end of the 30-day public comment period, which begins on the date of the second public notice.

Submit (or fax: 360-407-6426) the application to Ecology on or before the date of the first public notice. If you fax the application to Ecology, you must follow up with hard copy by mail.

Date of the first public notice: 1/15/15

Date of second public notice: 1/22/15 (Begins 30-day public comment period)

Example: Date of the first public notice: 01/01/2010

Date of second public notice: 01/08 2010

Name of the newspaper that will publish the public notices: Forks Forum

Complete this template using site-specific information. The bold language is required by WAC 173-226-130 and must be included in its entirety. (Either use the fill-in template below or attach on a separate sheet of paper, if necessary.)

Tony Romberg, P.O. Box 67, Beaver WA 98331 is seeking coverage under the Washington Department of Ecology's NPDES General Permit for Stormwater Discharges Associated with Industrial Activities.

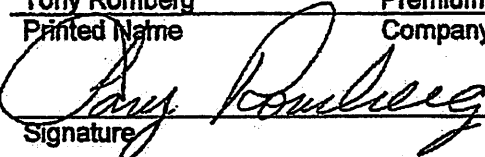
The industrial site, known as Premium Shingle is located at 1421 Russell Road in Forks, WA. Operations are due to start up on/started on (select one) May 1, 2014. Industrial activities include Cedar shingle milling. Stormwater from the site discharges to the Russell Road Stormwater Ditch and Mill Creek.

Any person desiring to present their views to the Department of Ecology concerning this application may notify Ecology in writing within 30 days from the last date of publication of this notice. Comments may be submitted to:

Washington Dept of Ecology
Water Quality Program – Industrial Stormwater
PO Box 47696
Olympia, WA 98504-7696

VII. Certification of Permittee*

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

<u>Tony Romberg</u>	<u>Premium Shingle, LLC</u>	<u>Owner</u>
Printed Name	Company	Title
		<u>1/8/15</u>
Signature		Date

***Federal regulations require this application is signed by one of the following:**

- A. In the case of corporations, by a principal executive officer of at least the level of vice president.
- B. In the case of a partnership, by a general partner of a partnership.
- C. In the case of sole proprietorship, by the proprietor.
- D. In the case of a municipality, state, federal, or other public facility: by either a principal executive officer or ranking elected official.

Return this signed original document to the below address. Make sure you retain a copy for your records.

Washington Department of Ecology
Water Quality Program – Industrial Stormwater
PO Box 47696
Olympia, WA 98504-7696

If you have any questions, please call:

- Shawn Hopkins 360-407-6442 or shop461@ecy.wa.gov for Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Skagit, Snohomish, Spokane, Stevens, Walla Walla, Whatcom, and Whitman counties.
- Clay Keown 360-407-6048 or ckeo461@ecy.wa.gov for Island, King (except Seattle), and San Juan counties.
- Josh Klimek 360-407-7451 or jokl461@ecy.wa.gov for city of Seattle and Kitsap, Pierce, and Thurston counties.
- Joyce Smith 360-407-6858 or josm461@ecy.wa.gov for Benton, Chelan, Clallam, Clark, Cowlitz, Douglas, Grays Harbor, Jefferson, Kittitas, Klickitat, Lewis, Mason Okanogan, Pacific, Skamania, Wahklakum, and Yakima counties.

To request ADA accommodation or materials in a format for the visually impaired, call Ecology at 360-407-6401. Persons with impaired hearing may call Washington Relay Service at 711. Persons with speech disability may call TTY at 877-833-6341.

ATTACHMENT B

Permit Coverage Letter

Dated: March 20, 2015

Premium Shingle, LLC



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000

711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

March 20, 2015

Tony Romberg
Owner
Premium Shingle LLC
PO Box 67
Beaver, WA 98331

Permit No. WAR302620
Facility Name: Premium Shingle
Location: 1421 Russell Rd
City: Forks
County: Clallam

RE: Coverage under the Industrial Stormwater General Permit

Dear Mr. Romberg:

The Washington Department of Ecology (Ecology) has reviewed your application for coverage under the Industrial Stormwater General Permit (permit). We are granting your facility coverage under the permit, effective March 20, 2015. Retain this letter with the enclosed permit and your Stormwater Pollution Prevention Plan. It is the official record of permit coverage for your facility.

Sampling Requirements

The permit requires sampling and analysis of stormwater discharged from your facility. This letter includes a summary of the sampling requirements for your facility, based on the best information available to Ecology. If you believe there is a discrepancy between what the permit requires and the sampling summary in this letter, please contact Ecology immediately. In the case of a difference between the permit and the sampling summary, the permit takes precedence.

Reporting Requirements

You are required to submit a quarterly Discharge Monitoring Report (DMR) for each reporting period, even if stormwater was not discharged or sampled. Your first reporting period will be the 2nd quarter (April, May, and June) of 2015 and your first DMR must be submitted by August 15, 2015. The DMR due dates are summarized in the table below:

Reporting Period	Months	DMR Due Date
1 st	January-March	May 15
2 nd	April-June	August 15
3 rd	July-Sept	November 15
4 th	October-December	February 15

You must submit DMRs and Annual Reports electronically, using Ecology's Water Quality Permitting Portal- Permit Submittals application, unless Ecology granted you a waiver from electronic reporting. You can find more information regarding Ecology's Water Quality Permitting Portal on our website: <http://www.ecy.wa.gov/programs/wq/permits/paris/webdmr.html>

If you have technical questions regarding Ecology's Water Quality Permitting Portal, please contact the portal staff at (800) 633-6193/option 3 or email WQWebPortal@ecy.wa.gov.



Tony Romberg
March 20, 2015
Page 2

Appeal of Permit Coverage

You have a right to appeal the terms and conditions of the general permit, both as they apply to an individual discharger, and the conditions of the general permit itself, to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of this permit issuance notice. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do the following within 30 days of the date of receipt of this notice:

- File your appeal and a copy of this notice with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this notice on Ecology in paper form - by mail or in person. (See addresses below.) E-mail is not accepted.

Address and Location Information

Street Addresses	Mailing Addresses
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608
Pollution Control Hearings Board 1111 Israel Road SW, Suite 301 Tumwater, WA 98501	Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903

For Additional Information or Assistance

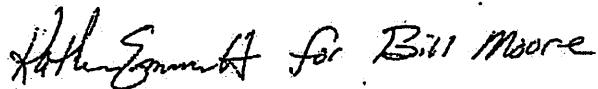
Ecology is committed to providing assistance to you. Please review our web page at <http://www.ecy.wa.gov/programs/wq/stormwater/industrial/index.html>. For questions about transfers, terminations, and other administrative issues, please contact Joyce Smith at joyce.smith@ecy.wa.gov or (360) 407-6858.

If you have questions regarding stormwater management issues at your site, please contact Kevin Hancock of Ecology's Southwest Regional Office in Lacey at kevin.hancock@ecy.wa.gov or (360) 407-6298.

Questions

If you have questions regarding the permit, please contact Jeff Killelea at jeff.killelea@ecy.wa.gov or (360) 407-6127.

Sincerely,

 for Bill Moore

Bill Moore, P.E., Manager
Program Development Services Section
Water Quality Program

Permit No. WAR302620

Facility Name: Premium Shingle

Location: 1421 Russell Rd, Forks

Sic Code: 2421

Summary of Your Facility's ISGP Monitoring Requirements

This summary is based on the best information available to Ecology about your facility. If you believe there is a discrepancy between what the permit requires and the enclosed summary, please contact Ecology immediately. In the case of a difference between the permit as applied to your facility and the summary, the permit requirements take precedence.

Benchmarks and Sampling Requirements Applicable to All Facilities (Condition S5, Table 2)

<u>Parameter</u>	<u>Units</u>	<u>Benchmark Value</u>	<u>Analytical Method</u>	<u>Laboratory Quantitation Level¹</u>
Turbidity	NTU	25	EPA 180.1 Meter	0.5
pH	s.u.	Between 5.0 – 9.0	Meter/Paper ²	±0.5
Zinc, Total	µg/L	117	EPA 200.8	2.5
Oil Sheen	Yes/No	No visible oil sheen	N/A	N/A
Copper, Total	µg/L	Western WA: 14 Eastern WA: 32	EPA 200.8	2.0

Industry-Specific Benchmarks and Sampling Requirements (Condition S5, Table 3)

<u>Parameter</u>	<u>Units</u>	<u>Benchmark Value</u>	<u>Analytical Method</u>	<u>Laboratory Quantitation Level</u>
COD	mg/L	120	SM5220-D	10
TSS	mg/L	100	SM2540-D	5

Additional Sampling: Ecology may have established site-specific sampling requirements in addition to those contained in the ISGP (Administrative Order, permit modification, etc.). These additional requirements are not addressed in this summary.

¹ The Permittee shall ensure laboratory results comply with the quantitation level (QL) specified in the table. However, if an alternate method from 40 CFR Part 136 is sufficient to produce measurable results in the sample, the Permittee may use that method for analysis. If the Permittee uses an alternative method it must report the test method and QL on the discharge monitoring report.

² Permittees shall use either a calibrated pH meter or narrow-range pH indicator paper with a resolution not greater than ± 0.5 SU.

ATTACHMENT C

Aerial Photograph

(Obtained from Bing.com)

Premium Shingle, LLC



Legend

— Identifies the stormwater flow pathway.

ATTACHMENT D

Photograph Documentation

Unless otherwise noted, all photographs were taken by Joe Roberto on June 6, 2016.

Premium Shingle, LLC



Legend



Identifies the photograph documentation photo number, the approximate location of the photographer, and the photograph direction.



Photo #1: View of the roadside sign along Russell Road. The lot with address 1421 is the location of Premium Shingle, LLC and 1381 is the location of the neighboring property owned by Rainy Day Shake and Shingle, Inc. Camera photograph #SAM 2383.



Photo #2: Easterly view showing the front (west side) of the processing building at the facility. Photographer is standing along Russell Road. Camera photograph #SAM 2385.



Photo #3: View inside the processing building of the cedar blocks being routed to the saws to manufacture shingles. Camera photograph #SAM 2397.



Photo #4: Southerly view along the east side of the processing building. Note the conveyor used to move wood waste from the building to the trailer. Camera photograph #SAM 2393.



Photo #5: Westerly view of the drainage pathway to outfall 001. This is a view along the south side of the processing building. Note the empty wood bins in the background. Camera photograph #SAM 2388.

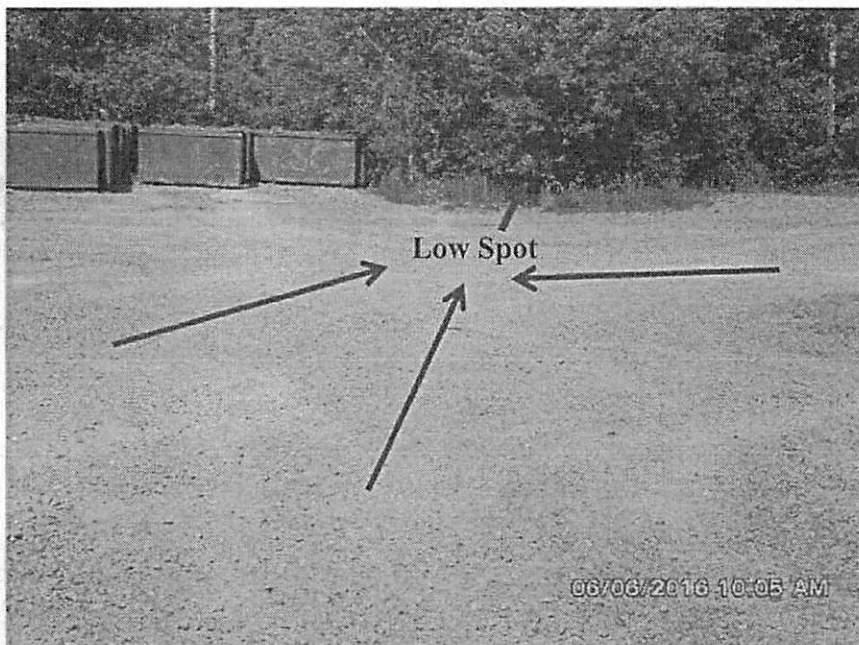


Photo #6: Westerly view showing the empty wood bins located along the western property boundary. The facility sampling location is located just to the right of these wood bins. The area to the right of the wood bins is the low spot on the property where stormwater accumulates before flowing off the property. Camera photograph #SAM 2386.

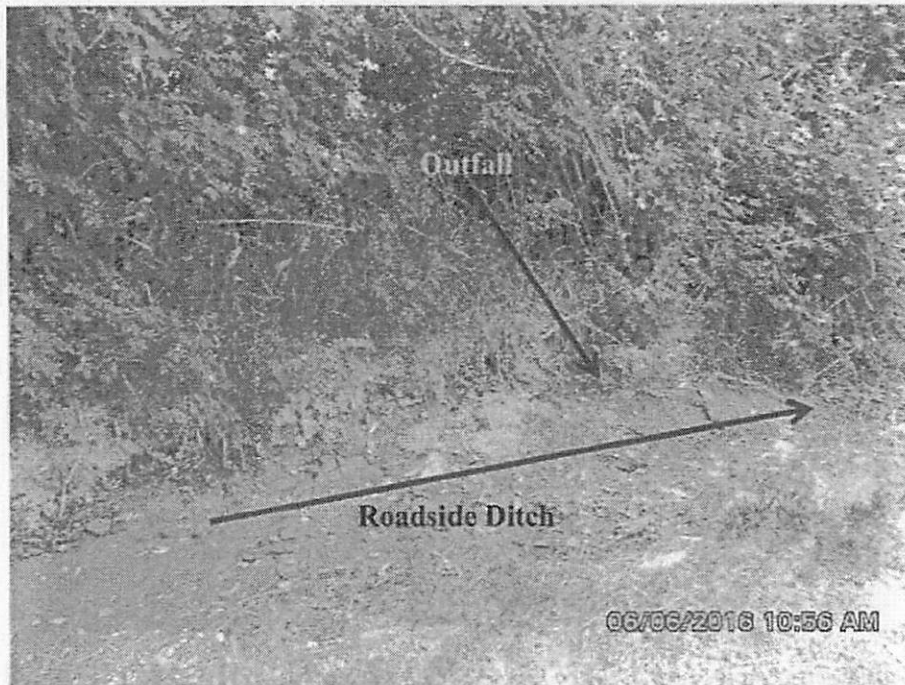


Photo #7: View in the vicinity of the outfall location. Note the roadside ditch in the foreground (along Russell Road) which receives this discharge. Camera photograph #SAM 2398.



Photo #8: Southerly view showing the roadside ditch along Russell Road. Camera photograph #SAM 2399.

ATTACHMENT E

Facility Monitoring Results

Premium Shingle, LLC



LIBBY ENVIRONMENTAL, INC.

4139 Libby Road NE • Olympia, WA 98506
(360) 352-2110 • FAX (360) 352-4154

Premium Shingle, LLC
Sample Location: Forks, Washington

Libby Project # : L150604-4

Project Name: STORMWATER
Client Project #: n/a
Sample Name: Russell
Collection Date: 6-2-2015
Received Date: 6-4-2015
Report Date: 6-17-2015

Parameter	Your Result	Units	WA DOE Benchmarks	Method	MDL	PQL	Date of Analysis	Analysis
pH	7.0	s.u.	5 - 9	Meter / Test Strip	n/a	±0.5		(in field)
Turbidity	3.3	NTU	25	EPA 180.1	n/a	0.5	6-4-2015	KE
Total Zinc	47.4	µg/L	117	EPA 7010 Series	1.94	2.5	6-6-2015	DP
Total Copper	8.7	µg/L	14	EPA 7010 Series	1.27	2.0	6-6-2015	DP
TSS	nd	mg/L	100	EPA SM 2540 D	n/a	5.0	6-5-2015	EB
COD	20.9	mg/L	120	EPA SM 5220 D	4.2	10.00	6-15-2015	MW

nd = Not Detected

MDL = Method Detection Limit

PQL = Laboratory Practical Quantitation Level

n/a = Not Applicable



LIBBY ENVIRONMENTAL, INC.

4139 Libby Road NE • Olympia, WA 98506
(360) 352-2110 • FAX (360) 352-4154

Premium Shingle, LLC
Sample Location: Forks, Washington

Libby Project # : L150904-4

Project Name: STORMWATER
Client Project #: n/a
Sample Name: Russell-1
Collection Date: 9-3-2015
Received Date: 9-4-2015
Report Date: 9-21-2015

Parameter	Your Result	Units	WA DOE Benchmarks	Method	MDL	PQL	Date of Analysis	Analyst
pH	7.0	s.u.	5 - 9	Meter / Test Strip	n/a	±0.5		(in field)
Turbidity	22.8	NTU	25	EPA 180.1	n/a	0.5	9-4-2015	MF
Total Zinc	7.5	µg/L	117	EPA 7010 Series	1.94	2.5	9-7-2015	DP
Total Copper	7.0	µg/L	14	EPA 7010 Series	1.27	2.0	9-7-2015	DP
TSS	11.0	mg/L	100	EPA SM 2540 D	n/a	5.0	9-8-2015	MF
COD	10.3	mg/L	120	EPA SM 5220 D	4.2	10.0	9-18-2015	MW

nd = Not Detected

MDL = Method Detection Limit

PQL = Laboratory Practical Quantitation Level

n/a = Not Applicable



LIBBY ENVIRONMENTAL, INC.

4139 Libby Road NE • Olympia, WA 98506
(360) 352-2110 • FAX (360) 352-4154

Premium Shingle, LLC
Sample Location: Forks, Washington

Libby Project #: L160216-3

Project Name: STORMWATER
Client Project #: n/a
Sample Name: Russell-1
Collection Date: 2-15-2016
Received Date: 2-16-2016
Report Date: 3-4-2016

Parameter	Your Result	Units	WA DOE Benchmarks	Method	MDL	PQL	Date of Analysis	Analyst
pH	6.0	s.u.	5 - 9	Meter / Test Strip	n/a	±0.5		(in field)
Turbidity	2.8	NTU	25	EPA 180.1	n/a	0.5	2-16-2016	MF
Total Zinc	8.5	µg/L	117	EPA 7010 Series	0.62	2.5	2-21-2016	DP
Total Copper	2.6	µg/L	14	EPA 7010 Series	1.87	2.0	2-21-2016	DP
TSS	nd	mg/L	100	EPA SM 2540 D	n/a	5.0	2-19-2016	MF
COD	nd	mg/L	120	EPA SM 5220 D	4.2	10.0	3-3-2016	MW

nd = Not Detected

MDL = Method Detection Limit

PQL = Laboratory Practical Quantitation Level

n/a = Not Applicable



LIBBY ENVIRONMENTAL, INC.

4139 Libby Road NE • Olympia, WA 98506

(360) 352-2110 • FAX (360) 352-4154

Premium Shingle, LLC

Sample Location: Forks, Washington

Libby Project # : L160330-2

Project Name: STORMWATER

Client Project #: n/a

Sample Name: Russell-1

Collection Date: 3-29-2016

Received Date: 3-30-2016

Report Date: 4-13-2016

Parameter	Your Result	Units	WA DOE Benchmarks	Method	MDL	PQL	Date of Analysis	Analyst
pH	6.0	s.u.	5 - 9	Meter / Test Strip	n/a	±0.5		(in field)
Turbidity	2.5	NTU	25	EPA 180.1	n/a	0.5	3-30-2016	MF
Total Zinc	17.4	µg/L	117	EPA 7010 Series	0.62	2.5	4-2-2016	DP
Total Copper	5.2	µg/L	14	EPA 7010 Series	1.87	2.0	4-2-2016	DP
TSS	nd	mg/L	100	EPA SM 2540 D	n/a	5.0	4-4-2016	MF
COD	45	mg/L	120	EPA SM 5220 D	0.1	2.0	4-11-2016	KRD

nd = Not Detected

MDL = Method Detection Limit

PQL = Laboratory Practical Quantitation Level

n/a = Not Applicable



LIBBY ENVIRONMENTAL, INC.

4139 Libby Road NE • Olympia, WA 98506
(360) 352-2110 • FAX (360) 352-4154

Premium Shingle, LLC
Sample Location: Forks, Washington

Libby Project # : L160614-2

Project Name: STORMWATER
Client Project #: n/a
Sample Name: Russell-1
Collection Date: 6-13-2016
Received Date: 6-14-2016
Report Date: 6-23-2016

Parameter	Your Result	Units	WA DOE Benchmarks	Method	MDL	PQL	Date of Analysis	Analyst
pH	6.5	s.u.	5 - 9	Meter / Test Strip	n/a	±0.5		(in field)
Turbidity	1.7	NTU	25	EPA 180.1	n/a	0.5	6-14-2016	MF
Total Zinc	7.8	µg/L	117	EPA 7010 Series	0.62	2.5	6-16-2016	JD
Total Copper	3.4	µg/L	14	EPA 7010 Series	1.87	2.0	6-16-2016	JD
TSS	nd	mg/L	100	EPA SM 2540 D	n/a	5.0	6-15-2016	MF
COD	30.8	mg/L	120	EPA SM 5220 D	4.2	10.0	6-21-2016	MW

nd = Not Detected

MDL = Method Detection Limit

PQL = Laboratory Practical Quantitation Level

n/a = Not Applicable

ATTACHMENT F

Monthly Visual Inspection Report

(Dated: June 2016)

Premium Shingle, LLC

INDUSTRIAL STORMWATER MONTHLY INSPECTION REPORT

June

Inspections must be conducted by a person with the knowledge and skills to assess conditions and activities that could impact stormwater quality at the facility, and evaluate the effectiveness of best management practices required by this permit. Retain a copy of the completed and signed form in accordance with Permit Condition S9.C.

FACILITY NAME: <u>1421 Russell Road</u>		INSPECTION TIME: <u>4:34 PM</u> DATE: <u>6/6/16</u>	
WEATHER INFORMATION: <ul style="list-style-type: none"> Description of Weather Conditions (e.g., sunny, cloudy, raining, snowing, etc.): <u>Sunny / overcast</u> Was stormwater (e.g., runoff from rain or snowmelt) flowing at outfalls and/or discharge areas shown on the Site Map during the inspection: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Comments: _____ 			
I. POTENTIAL POLLUTANT SOURCE AREA INSPECTION AND BEST MANAGEMENT PRACTICES EVALUATION			
SWPPP and Site Map: Have a copy of the SWPPP and site map with you during the inspection so that you can ensure they are current and accurate. Use it as an aide in recording the location of any issues you identify during the inspection. <ul style="list-style-type: none"> Is the Site Map current and accurate? Is the SWPPP inventory of activities, materials and products current? Any new potential pollutant sources must be added to the map and reflected in the <i>SWPPP Facility Assessment & Tables 2, 2A, 3 and 5.</i>	Yes	No	Findings and Remedial Action Documentation: Describe any findings below and the schedule for remedial action completion including the date initiated and date completed or expected to be completed.
Vehicle/Equipment Areas: <i>Equipment cleaning: Check NA if not performed on-site. Skip section.</i> Is equipment washed and/or cleaned only in designated areas? <ul style="list-style-type: none"> Observe washing: Is all wash water captured and properly disposed of? <i>Equipment fueling: Check NA if not performed on-site. Skip section.</i> <ul style="list-style-type: none"> Are all fueling areas free of contaminant buildup and evidence of chronic leaks/spills? Are all chemical liquids, fluids, and petroleum products, on an impervious surface that is surrounded with a containment berm or dike that is capable of containing 10% of the total enclosed tank volume or 110% of the volume contained in the largest tank, whichever is greater? Are structures in place to prevent precipitation from accumulating in containment areas? <ul style="list-style-type: none"> If not, is there any water or other fluids accumulated within the containment area? Note: If containment areas are not covered to prevent water from accumulating, the SWPPP must include a plan describing how accumulated water will be managed and disposed of. 	Yes	No	NA
Findings and Remedial Action Documentation: <div style="font-size: 1.2em; margin-top: 20px;"><i>Equipment not washed</i></div>	✓	n/a	NA
(Continuation of findings and documentation from previous section)	✓	✓	✓

	Yes	No	NA	Findings and Remedial Action Documentation:
Equipment maintenance:				
• Are maintenance tools, equipment and materials stored under shelter, elevated and covered?	✓			
• Are all drums and containers of fluids stored with proper cover and containment?	✓			
• Are exteriors of containers kept outside free of deposits?	✓			
• Are any vehicles and/or equipment leaking fluids? Identify leaking equipment.		✓		
• Is there evidence of leaks or spills since last inspection? Identify and address.		✓		
• Are materials, equipment, and activities located so that leaks are contained in existing containment and diversion systems (confine the storage of leaky or leak-prone vehicles and equipment awaiting maintenance to protected areas)?	✓			
Add any additional site-specific BMPs:				

I. POTENTIAL POLLUTANT SOURCE AREA INSPECTION AND BEST MANAGEMENT PRACTICES EVALUATION

	Yes	No	NA	Findings and Remedial Action Documentation:
Good Housekeeping BMPs:				
1. Are paved surfaces free of accumulated dust/sediment and debris?				
• Date of last quarterly vacuum/sweep _____			✓	
• Are there areas of erosion or sediment/dust sources that discharge to storm drains?		✓		
2. Are all waste receptacles located outdoors:				
• In good condition?			✓	
• Not leaking contaminants?				
• Closed when is not being accessed?				
• External surfaces and area free of excessive contaminant buildup?				
3. Are the following areas free of accumulated dust/sediment, debris, contaminants, and/or spills/leaks of fluids?	✓			
• External dock areas				
• Pallet, bin, and drum storage areas				
• Maintenance shop(s)				
• Equipment staging areas (loaders, tractors, trailers, forklifts, etc)				
• Around bag-house(s)				
• Around bone yards				
• Other areas of industrial activity:				

Spill Response and Equipment: Are spill kits available, in the following locations? <ul style="list-style-type: none"> • Fueling stations • Transfer and mobile fueling units • Vehicle and equipment maintenance areas Do the spill kits contain all the permit required items? <ul style="list-style-type: none"> • Oil absorbents capable of absorbing 15 gallons of fuel. • A storm drain plug or cover kit. • A non-water containment boom, a minimum of 10 feet in length with a 12 gallon absorbent capacity. • A non-metallic shovel. • Two five-gallon buckets with lids. Are contaminated absorbent materials properly disposed of?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>	Findings and Remedial Action Documentation:
I. POTENTIAL POLLUTANT SOURCE AREA INSPECTION AND BEST MANAGEMENT PRACTICES EVALUATION				
General Material Storage Areas: <ul style="list-style-type: none"> • Are damaged materials stored inside a building or another type of storm resistance shelter? • Are all uncontained material piles stored in a manner that does not allow discharge of impacted stormwater? • Are scrap metal bins covered? • Are outdoor containers covered? 	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>	Findings and Remedial Action Documentation:
Stormwater BMPs and Treatment Structures: Visually inspect all stormwater BMPs and treatment structures devices, discharge areas infiltration and outfalls shown on the Site Map. <ul style="list-style-type: none"> • Are BMPs and treatment structures in good repair and operational? • Are BMPs and treatment structures free from debris buildup that may impair function? • The permit requires Permittees to clean catch basins when the depth of debris reaches 60% of the sump depth. In addition, the Permittee must keep the debris surface at least 6 inches below the outlet pipe. Based on this, do catch basins need to be cleaned? • Are berms, curbing or other methods used to divert and direct discharges adequate and in good condition? 	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>	Findings and Remedial Action Documentation:
Observation of Stormwater Discharges: <ul style="list-style-type: none"> • Is the discharge free of floating materials, visible oil sheen, discoloration, turbidity, odor, foam or any other signs of contamination? • Water from washing vehicles or equipment, steam cleaning and/or pressure washing is considered process wastewater and is not allowed to comeingle with stormwater or enter storm drains. Is process water comingling with stormwater or entering storm drains? • Illicit discharges include domestic wastewater, noncontact cooling water, or process wastewater (including leachate). Were any illicit discharges observed during the inspection? 	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>	Findings and Remedial Action Documentation:

II. CORRECTIVE ACTION AND SWPPP MODIFICATIONS DESCRIPTIONS: Additional space to describe inspection findings and corrective actions if needed. Provide brief explanation of the general location and the rationale for the additional or different BMPs.

None

III. CERTIFICATION STATEMENTS AND SIGNATURES:

Inspector - Certification: This section must be completed by the person who conducted the site inspection prior to submitting this form to the person with signature authority (see Permit Condition G2) or a duly authorized representative of that person.

- ☒ The facility is in compliance with the terms and conditions of the SWPPP and the Industrial Stormwater General Permit.
- ☐ The facility is out of compliance with the terms and conditions of the SWPPP and the Industrial Stormwater General Permit. This report includes the remedial actions that must be taken to meet the requirements of the SWPPP and permit, including a schedule of implementation of the remedial actions.

"I certify that this report is true, accurate, and complete, to the best of my knowledge and belief."

<i>Tony Romberg</i> Inspector's Name - Printed	<i>Tony Romberg</i> Inspector's Signature	<i>Owner/Operator</i> Inspector's Title	<i>6/6/16</i> Date
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Permittee - Certification:

- ☒ The facility is in compliance with the terms and conditions of the SWPPP and the Industrial Stormwater General Permit.
- ☐ The facility is out of compliance with the terms and conditions of the SWPPP and the Industrial Stormwater General Permit. This report includes the remedial actions that must be taken to meet the requirements of the SWPPP and permit, including a schedule of implementation of the remedial actions.

"I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

<i>Tony Romberg</i> PRINTED NAME of person with Signature Authority (permit condition G2.A) or a Duly Authorized Representative ¹	<i>Tony Romberg</i> SIGNATURE of person with Signature Authority (permit condition G2.A) or a Duly Authorized Representative ¹	<i>6/6/16</i> DATE
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¹A person is duly authorized representative only if 1) the authorization is made in writing by a person described in Permit Condition G2.A and submitted to Ecology, and 2) the authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility, such as the position of plant manager, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters.

ATTACHMENT G

Employee Training Records

Premium Shingle, LLC

PREMIUM SHINGLE LLC EMPLOYEE SWPPP TRAINING AND DISCUSSION. Aug 2 2016

On July 8 we held a crew training on BMPs concerning the minimizing of dust and petroleum to our storm water and the procedures in the event of a spill of any oils or fuel such as use of the spill kit and containment procedures, ie drip pans and adsorbents, also discussed the importance of housekeeping such as keeping areas outside and inside free from as much dust and wood residue as possible. Also it was discussed how well our DMRs have been and that is a result of the employees keeping their areas clean.

Those present: Scott Loushin, John Kraft, Michelle Beglinger, Dana Cross

Today we held an additional meeting including a new hire. We covered all of section 4 in the SWPPP, good housekeeping, preventative maintenance, illicit discharges, operational source control BMPs for dust control at manufacturing areas, loading and unloading areas, equipment storage, oil spills, transfer areas, spill prevention and cleanup. Also the importance of reporting to me any spills for reporting and review of how it was handled.

Those present: Scott Loushin, John Kraft, Michelle Beglinger, Dana Cross, Tyler Day

John Kraft

Michelle Beglinger

John Kraft

Dana Cross

Dana Cross